

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

RALPH S. JANVEY, et al.,

Plaintiffs,

v.

**GREENBERG TRAURIG, LLP,
HUNTON & WILLIAMS, LLP; and
YOLANDA SUAREZ,**

Defendants.

§
§
§
§
§
§
§
§
§
§

Civil Action No. 3:12cv4641-N

**APPENDIX IN SUPPORT OF GREENBERG TRAURIG, LLP'S
OPPOSITION TO MOTION FOR CLASS CERTIFICATION**

Defendant Greenberg Traurig, LLP submits this Appendix in support of its Response and Brief in Opposition to Motion for Class Certification.

Index

Exhibit	Description
	Declaration of Sim Israeloff.
1.	Superseding Indictment of Robert Allen Stanford.
2.	Order on the SEC's motion for summary judgment in case no. 3:09cv0298.
3.	Excerpts from the Trial Transcript of Allen Stanford's criminal trial Vol. 13 (Feb. 8, 2012).
4.	SFIS Do's and Don'ts memo to Stanford (Sept. 15, 1998).
5.	Excerpts from the deposition of Jorge Salgado/Michoacan Trust December 4, 2015.
6.	Excerpts from the deposition of Pam Reed December 3, 2015.
6a.	Exhibit 3 to the deposition of Pam Reed December 3, 2015.
7.	Excerpts from the testimony of Jane Bates Sept. 29, 2010.

8.	Excerpts from the deposition of Samuel Troice in <i>Troice v. Proskauer Rose, LLP</i> , No. 3:09-cv-01600-N (February 3, 2015)(“ <i>Proskauer</i> ”).
9.	Motion to approve the settlement with BDO, No. 3:09cv0298 (May 15, 2015).
10.	Excerpts from the deposition of Mark Russell as designee of Ralph Janvey (Dec. 17, 2015).
11.	Excerpts from the deposition of Samuel Troice (December 14, 2015).
12.	Excerpts from the Second Amended Class Action Complaint in <i>Proskauer</i> (Oct. 9, 2009).
13.	Jury Charge in <i>Adderly v. Sterling Trust and others</i> , no. 236-169214-97, 236 th District Court, Tarrant County, Texas.
14.	Excerpts from the Trial Transcript of Allen Stanford’s criminal trial Vol. 4 (Jan. 26, 2012).
15.	SEC 2005 Stanford Investor Questionnaire.
16.	Bloomberg article, “SEC Investigating Stanford Group Offshore-Bank CDs” (July 3, 2008).
17.	Report Of The 2009 Special Review Committee On FINRA’s Examination Program In Light Of The Stanford And Madoff Schemes (September 2009) http://www.finra.org/sites/default/files/Corporate/p120078.pdf .
18.	Defendants’ Opposition To Plaintiffs’ Motion For Class Certification, No. 3:09-CV-02384-N (Nov. 2, 2015)(“ <i>Trustmark</i> ”).
19.	Opposition Of Defendants Proskauer Rose LLP et al. to Plaintiffs’ Opposed Motion for Class Certification, <i>Proskauer</i> (April 20, 2015).
20.	Willis of Colorado, Inc., Willis Limited, and Amy S. Baranoucky’s Opposition To Plaintiffs’ Motion For Class Certification, NO. 3:09-cv-01274-N (April 20, 2015)(“ <i>Willis</i> ”)
21.	Defendant Bowen, Miclette & Britt, Inc.’s Opposition To Plaintiffs’ Motion For Class Certification in <i>Willis</i> (April 20, 2015).
22.	Pershing’s Opposition to Plaintiffs’ Motion For Class Certification, No. 3:09-cv-02199 (Aug. 10, 2015)(“ <i>Pershing</i> ”).
23.	United States’ Sentencing Memorandum, U.S. v. Stanford (June 6, 2012)
24.	Stipulation to form the OSIC in case no. 3:09cv0298.
Pershing Exhibit 81.	Declaration of Antonio Gidi on the law of Venezuela, Panama, and Mexico.

Proskauer Complaint D.E. 6	Plaintiffs' Second Amended Class Action Complaint, <i>Samuel Troice et al., v. Proskauer Rose, LLP et al.</i> , no. 3:09-cv-01600-N-BG (Oct. 9, 2009).
Proskauer Exhibit 32.	Declaration of Dr. Claus Von Wobeser, Esq. on Mexican law.
Proskauer Exhibit 33.	Declaration of Antonio Gidi on the law of Peru, Panama, El Salvador, and Ecuador.
Proskauer Exhibit 34.	Declaration of Manuel A. Gomez on the law of Venezuela and Mexico.
Proskauer Exhibit 35.	Declaration of Pedro Alberto Jedlicka on the law of Venezuela.
Trustmark Exhibit 74.	Declaration of James Otis Rodner on Venezuela law.
Trustmark Exhibit 75.	Declaration of Eduardo Siqueiros T. on Mexican law.
Trustmark Exhibit 76.	Declaration of David Arias on Spanish law.
Trustmark Exhibit 77.	Declaration of Professor George A. Bermann on French law.
Trustmark Exhibit 78.	Declaration of Professor Adrian Briggs on English law.
Trustmark Exhibit 79.	Declaration of Antonio Gidi on the law of (1) Venezuela, (2) Peru, (3) Panama, (4) El Salvador, (5) Ecuador, and (6) Mexico
Trustmark Exhibit 80	Declaration of Rogier F. Van Den Heuvel on the law of the former Netherlands Antilles: Aruba, Curacao, Sint Maarten, and the BES (Bonaire, Sint Eustatius and Saba).
Trustmark Exhibit 81.	Declaration of Arturo Hoyos on the law of Panama.
Trustmark Exhibit 83.	Declaration of J. Domingo Rivarola Reisz on the law of Perú.
Trustmark Exhibit 84.	Declaration of Janet Walker on the law of Canada.
Trustmark Exhibit 85.	Declaration of Dr. Stephan Wilske on the law of Germany.
Trustmark Exhibit 86.	Declaration of Eduardo Zuleta on the law of Columbia.

Trustmark Exhibit 87.	Declaration of Professor Dr. Isabelle Romy on Swiss Law.
Willis Exhibit AA.	Declaration of Manuel A. Gomez on the law of Venezuela and Mexico.

Respectfully submitted,

By: /s/ Jim E. Cowles

JIM E. COWLES

Texas Bar No. 04931000

jcowles@cowlesthompson.com

SIM ISRAELOFF

Texas Bar No. 10435380

sisraeloff@cowlesthompson.com

R. MICHAEL NORTHRUP

Texas Bar No. 15103250

mnorthrup@cowlesthompson.com

COWLES & THOMPSON, P.C.

901 Main Street, Suite 3900

Dallas, TX 75202

(214) 672-2000 (Tel)

(214) 672-2301 (Fax)

**ATTORNEYS FOR DEFENDANT
GREENBERG TRAURIG, LLP**

CERTIFICATE OF SERVICE

The undersigned certifies that on the 19th day of January, 2016, a true and correct copy of the foregoing document was delivered via electronic means pursuant to FED. R. CIV. P. 5(b)(2)(D) and Local Rule 5.1, to all counsel of record.

/s/ Sim Israeloff

SIM ISRAELOFF